1318 SEP 23 1999

Cherokee Watershed Group

September 22, 1999

CALFED Bay/Delta Program
1416 Ninth Street, Suite, 1155
Sacramento, CA 95814

Re: Comments on the CALFED Draft Programmatic Environmental Impact Report and EIS

Cherokee Watershed Group has a compelling interest in commenting on the Water Transfer Element for the Draft CALFED Programmatic EIR. We are located in the Butte Basin Aquifer of the Sacramento Valley. Our past experience with voluntary water transfer operations carried on by Western Canal Water District and overseen by the Department of Water Resources makes us particularly qualified to offer a reality check on the many assumptions imbedded in this document.

During that water transfer, with essentially the same protections offered in this document, there were impacts to neighboring farmers, private homeowners, crop production, and native vegetation besides forcing community water rationing. The district board and DWR did little to curtail massive pumping and later denied responsibility. A year later a token offer towards damage settlement was made and refused. Included in that settlement was a mandatory statement that no impact was done to other neighbors and the community that had yet to discover their impacts. This points to conflict of interest and lack of protection through legal process for individual well owners who can easily be priced out of any day in court.

Our comments deal with misinterpretations of legislative policy, incomplete investigation of legal implications, imbalance in representation of regional interests, unsubstantiated assumptions stated as fact, inconsistent terminology, problematic process, limited sustainability of proposed actions, and environmental risks.

The specific Water Transfer Element, once a component of the core Water Use Efficiency program, allows us to look at the issue of reallocation of water in California. Transfers of water do not make *new water.*

LEGISLATIVE POLICY

The guiding Legislative policy used to justify planning California's future water security on a mix that includes water transfers has been misinterpreted.

Page B-1 Water Code~109

(a) The legislature hereby finds an declares that the growing water needs of the state require the use of water in an efficient manner and that the efficient use of water requires certainty in the definition of property rights to the use of water and transferability of such rights. It is hereby declared to be the established policy of the state to facilitate the voluntary transfer of water and water rights **where consistent with the public welfare of the place of export and the place of import.**

(b) The Legislature hereby directs the Department of Water Resources, the State Water Resources Control Board, and all other appropriate state agencies to **encourage voluntary transfers of water and water rights,** including, but not limited to, providing technical assistance to persons to identify and implement **water conservation measures** which will make **additional water available for transfer.**

The element of the public welfare of the place of export is talking about community values in water including the environment of the place of export as well. There is ample exhibition that Northern California does not see exportation of water resources guaranteed under both Area and Watershed of Origin as consistent with their welfare. Concerted comments against such a practice proposed by the State Supplemental Water Purchase Program is testament to that fact. Please include those comments in your consideration of this EIR. They ranged from pointing out the risks to local economies, future growth planning, environmental degradation, and water security.

An effort to offer water rights holders assurances for transfers made available from conservation or forgone use spurred added clarification but it did not resend the concept of **public welfare of the place of export.**

Page B-2 Water Code~382

(a) ...the agency may ....transfer...(1) Water that is surplus to the needs of the water users of the agency. (2) Water, the use of which is voluntarily foregone, during the period of the transfer, by a water user of the agency.

We need to recognize that the area surrounding the agency, while not considered in water district 3030 plans is part of that public welfare of the place of export. There is nothing in the CALFED document acknowledging that priority interest. That public interest does nothing to diminish agency water rights within their district for which the rights were originally acquired. It does establish overlying rights to water over buyer's or appropriator's rights (even if only temporary diversion through a transfer agreement).

CALFED assumes that the legal framework for transfers is in place and inevitable. We point out that existing provisions rely on surplus water (which is a debatable issue).

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... "so that water transfers do not cause degradation of groundwater basins or impair the correlative rights of overlying users and historical groundwater levels are sustained or improved."

This is the key that says that the Sacramento Valley is not a transfer source because of our hydrology...yet all the programs have 250TAF as groundwater supply contributed to calculation for state planning of integrated storage. Virtually all water applied and all water remaining within the aquifer is serving a useful function . The water does not percolate into an unusable aquifer. It becomes supply downstream. The water left in the aquifer makes its way towards the gaining rivers, and is available for the deep wells of overlying lands.

Northern California's winter rains do not provide abundant summer water. Study shows that each new well contributes to depressing summer groundwater levels. Therefore, a major groundwater substitution project would not be a "surplus water" sale. Water needs to be considered on its seasonal importance.

Finally, no consideration of the relationship of NAFTA and GATT to any legal protections relating to water sales has been mentioned. We look for this investigation as some have suggested that these treaties would supersede local controls through their "no protectionism clause".

REPRESENTATION

In looking at the composition of the public policy group, BDAC, and at the balance of participants at the Water Use Efficiency and Water Transfer Work Groups the imbalance in representation becomes evident. Please report that participation breakdown in your response to comments. We are looking for voices representing Northern California's Sacramento Valley. As the targeted source for these water transfers their voices are critical in deliberation. It is clear that taking more summer water from the Sacramento Valley would be seen as an admirable accomplishment for water short areas who were disproportionately represented. Remember the directive that transfers must be consistent with the public welfare of the place of export. Without voices for domestic well owners, groundwater dependent agriculture, rural communities, and environmental advocates you have no idea of perceived public welfare for the place of export.

UNSUBSTANTIATED ASSUMPTIONS

Beneficial Uses and economic efficiency and capacity to ensure water security for water source areas are all key assumptions inadequately evaluated yet stated as fact and justification for preferred alternative evaluation.

Economic calculations of highest and best use are flawed. Economic "externalities" such as community values, environmental viability and diversity, private well impacts and unreliability, diminished land values supporting farm operation loans and resale, pressure for sprawl into retired farmlands, hidden costs for air quality and associated health problems, lost commuter productivity, infrastructure to serve the sprawl loss of job base without alternatives for employment, social service costs from unemployment. Reduced tax base reduces county services in police protection, libraries, fire protection, road maintenance are just a few of the predictable shifts in economic well being attributable to perennial out-of-basin water transfers. There is the cost to the legal system for challenges, local governments to try to monitor sales, and to provide some protection. The list goes on.

The receiving end has not been assessed the secondary costs from sprawl and growth inducement which is serviced by these unreliable water transfers. These are loss in commuter productivity, air quality and associated health costs, costs of infrastructure to service sprawl, pollution of groundwater basins with MTBEs from auto fuel. What is the value of a

groundwater basin? All of these costs accrue along with the initial 30% loss in efficiency from carriage water.

The value of risk to both buying and selling regions is ignored along with the cost to communities from lost future opportunity to diversify their economic base. Selling regions may have a hard time even sustaining the local businesses and activity clusters ag economies support if they lose their critical mass.

The relative importance of local economic activity compared to economic volume must be shown. $1 M in a $100M economic unit is more important than $100 M in a $2 B economic unit. This must be reflected in considerations of beneficial use if economic considerations are to be used for CALFED alternative selection.

PROCESS

There is a lack of governance detail as well as provision for access to decision makers throughout the implementation plan. There is an offer of local control as a protection with the assumption that this adequately addresses **the public welfare of the place of export**. A petition with over 4000 signatures has been ignored since its presentation 6 weeks ago. The petition asked for equal representation groundwater interests on the local water commission, questioned conflict of interest, and requested a guiding principle of "no injury" from water sale activities (to avoid ratcheting down the water table over the years). How likely are private citizens going to be able to access CALFED decision makers where no process is in place?

CALFED offers reassuring words about protections, voluntary transfers, and community support however the document in inconsistent.

Pg. 4-9

> ...This inability, in the short-term to gain consensus does not preclude any transfer proposal from moving forward, especially for transfer types where agreement exists. Rather, in the interim, disagreements over transferability would continue to be resolved as they are now, on a case by case basis...

There are massive amounts of pre-1914 water that gets no evaluation from SWRCB. These two issues show direct conflict with the CALFED posture of publicly supported projects. Even if SWRCB can evaluate pre-1914 water transfers through controlling access to aqueduct facilities, transfers that do not use those facilities have no oversight.

SUSTAINABILITY OF ACTIONS

A State water storage plan or water budget using water gained from conjunctive use or temporarily by fallowing ag land which are both mitigation measures for already exceeded carrying capacity and overdraft, builds in a time bomb. Water transfers which move a known water resource out of its local watershed or water basin, encourages planning based on unreliable information. It allows development to eliminate drought safety margins in

estimating the area's carrying capacity. It masks reliable information of resources and carrying capacity for permitting agencies such as County Planning Departments and local citizens. Finally, this commodification of water, encourages outside speculation in land for water purposes which can do the same thing as condemning land for the purpose of appropriating the land's water. Condemnation would at least provide a tax shelter for the owner who finds he must sell the land or lose it due to declining profit margins. That very unprofitability could be due to declining water tables caused by other transfer operations. Condemnation for water is prohibited.
The expansion of water demand based on this information raises the risk of an eventual collapse of this house of cards. Huge impacts to all regions of the state are inevitable as demand hardens. Crisis management will include risks to economies, health and safety, and the environment in both buying and selling areas.

ENVIRONMENTAL RISKS

Transferring water which involves additional dependency on tapping groundwater basins in Northern California sacrifices water reliability for stream contribution, riparian habitat, seasonal availability of water tables for terrestrial vegetation and the wildlife that depends on it. The Cherokee Watershed, is almost entirely held as private property. It provides a oak land reach that supports endangered species with eagles and kestrels soaring to valley hunting grounds and back to the mountains for nesting. These wildlife corridors are every bit as critical for sustaining natural systems and protecting the critical mass of habitat as the restoration goals of the Delta. Fish find harbor in small lakes to move upstream during winter rains, deer, otter, beaver, fox all migrate through the system from mountain to valley. The valley rice provides extensive habitat for the winter migration along the Pacific flyway. The ducks in turn complete the food web for endangered birds in the winter. The loss of our oak corridors, farming operations, or grazing lands which provide recharge and wildlife range with ephemeral streams threatens the viability of the system. Redirecting impacts through shortsighted quick fixes for water supply is irresponsible. Discussions of establishing baseline data for micromanaging a healthy aquifer have ignored environmental baselines. They have ignored the predictable loss of water contributions to the rivers which supply the Delta, and the unidentified beneficial uses the dynamic groundwater system provides to downstream users, avoidance of subsidence, pollutant migration, and service as a safe maintenance-free water delivery infrastructure for overlying landowners.

TERMINOLOGY

The most dangerous element in this document is the incorrect definition of programs. Without clarity we negotiate rules and implementation guidelines without knowing what we do. Of particular concern to us is conjunctive use.

Conjunctive use is to make existing limited water resources go farther not to stimulate more consumption especially by assuming natural recharge is the refill source for groundwater substitution sales.

Water Banking for transfer means vacant capacity is leased to another (non overlying entity) for them to deposit their unused water for future withdrawal at some regulated ratio. This program is only available where vacant basin capacity is established. It can be done in an already over-exploited basin (where natural systems are already compromised and environmental degradation is already a fact of life.) It is necessary to prove that the "bubble or mound" of water deposited is retained in that area within the period of time calculated for withdrawal.

Transfer of water is choosing to forego your historical use of water and send it elsewhere....significant amounts of water from this action are not viable without impacting overlying users in Northern California if replacement pumping is part of the program. Using these terms interchangeably fosters abuse and CALFED agencies. We must reach consensus and support clear legal development of these applications and priority of rights to overlying area of origin users. These types of water shifts from areas of origin will essentially be giving appropriators of waters in distant basins priority over overlying lands. This is a dangerous risk to private property rights and public values in water and most importantly threatens the sustainability of healthy watersheds.

No Injury Rule. We have heard attorneys and agency staff advocate for the application of the no injury rule to water contractors only. Reassuring voices, however, tell us that the rule applies to all. Who decides this interpretation? Court cases are inadequate; there must be legislation. Is significance a criterion? Who decides significance and on what criteria? Without these issues resolved we are in danger of degrading yet a wider circle of natural systems in the name of "economic efficiency" and short sighted political bartering. Who advocates for local environments, communities, and well owners with no other alternative but their aquifer?

Sincerely

Gary L Cole

Gary Cole, Cherokee Watershed Director

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1318(7)

GROUP COMMENTS
PROPOSED STATE WATER CONTRACT
SUPPLEMENTAL WATER PURCHASE PROGRAM - a Program which was a water transfer program

The undersigned agencies and organizations respectfully submit the following outline of our concerns regarding the Draft Environmental Impact Report (DEIR) for the proposed State Water Project Supplemental Water Purchase Program (SWPP) (State Clearinghouse 94082033, 12/96). We have submitted individual comments, but wish to emphasize that many of the issues and concerns raised about the proposed SWPP are region-wide.

1. Public notification and participation in the CEQA process was insufficient.

CEQA specifically requires notification of all state, federal and local agencies which exercise authority over resources which may be affected by a project. Many local agencies were not adequately notified and local residents were not given an opportunity for input . We are concerned that this lack of public process may carry through into the future operation of the proposed SWPP.

2. The factual information presented concerning the proposed SWPP is far too vague, even for a program-level EIR.

The DEIR does not include enough site-specific information to allow the conclusion that DWR can make informed decisions concerning the program. The DEIR should provide a greater level of detail with respect to reasonably foreseeable subsequent activities, including the magnitude and likely source of affected water resources should the proposed SWPP be implemented.

The DEIR should be backed by sufficient study which reasonably provides, prior to project implementation, the following: identification of problem areas; demonstration that problems are well understood; and development of mitigation measures. In addition to a minimum baseline regional standard for groundwater protection, DWR should adopt locally developed standards addressing local water needs, both existing and projected.

3. The proposed groundwater monitoring program described in the DEIR is insufficient.

The DEIR states several times that potentially significant groundwater impacts cannot be determined with any measure of accuracy or predictability. This indicates that sufficient information does not exist to satisfy CEQA's full disclosure requirements. Given this level of uncertainty, site specific, basin-wide hydrogeologic data should be gathered prior to project implementation. A locally developed and locally endorsed groundwater monitoring program should be implemented prior to program implementation in the case of either ground or surface water transfers.

The language in the DEIR implies that groundwater overdraft will have already occurred before corrective measures are employed. Rather than merely review the impacts of pumping after there is a decline in the groundwater level, the transfer of water must immediately stop when a particular threshold is exceeded, regardless of whether it is attributed to the proposed SWPP or not.

Although financial compensation for pump and well modification costs and increased energy costs are proposed to be offered in cases where damage can be proved, there are no details. If impacts occur during any critical periods of the season, DWR must also be required to mitigate for crop losses.

4. Potential groundwater overdraft is not addressed in the DEIR.

The DEIR states that the proposed SWPP will not result in an increased rate of use of any natural resources (pg. 44, Environmental Checklist). This statement is false. The very nature of the proposed program will increase the rate of use of groundwater and surface water in the proposed project area.

The impact on the level of the groundwater table will be amplified because of the compounding effects of transfer of surface water in addition to increased groundwater pumping. In many areas, recharge of the groundwater is entirely dependent upon local irrigation, tail water flows and natural streams. The loss of recharge could result in lowering of the groundwater table. At its worst, this could occur during the critical summer irrigation period. As a result of the proposed program, the deep percolation recharge element currently provided by applied surface water will also be reduced in local aquifer systems.

The DEIR states that the proposed SWPP will not result in substantial reductions in the amount of water available for public water supplies. However, this conclusion is not supported by data included in the DEIR. Groundwater provides practically all of the domestic water in several cities and irrigation districts in potential water selling regions. A decline in the water table due to additional groundwater extraction may result in new costs for well deepening, and water treatment. Domestic water supplies are already experiencing decline in many counties and cities in the regions where water sales are proposed. Potential impacts upon domestic water supplies must be prevented, the water supplies must be monitored adequately, and impacts that occur must be mitigated.

5. Potential subsidence is not adequately addressed in the DEIR.

The prevention of land subsidence is not adequately addressed even though land subsidence has the greatest potential for catastrophic impacts. Subsidence

can irreversibly destroy storage capacities and damage flood-control levees. Urban, rural and agricultural wells could be damaged. Water extraction costs could increase. Roads, bridges, sewage lines and other infrastructures could be affected. Gradients of drains and flood control channels could be altered. Clay aquifers would never recover. The DEIR does not state how subsidence will be prevented or monitored. Subsidence has been experienced in several areas that are targeted for water sales by DWR.

6. Potential impacts on groundwater quality are not adequately addressed in the DEIR.

Preventing negative impacts on groundwater quality is very important since it is difficult, expensive and sometimes impossible to reclaim aquifers where water quality has deteriorated. Despite these dangers, the monitoring program proposed by DWR is vague. Baseline standards of groundwater quality and depth must be established prior to program implementation. These standards must be comprehensive, including agricultural and residential wells.

The DEIR states that groundwater pumping is proposed to continue until water quality degradation is detected, rather than presenting a plan to prevent it. Delaying mitigation strategies until such time that a suspected problem occurs does not mesh with the intent of CEQA.

The DEIR states that nitrate contamination only occurs in a "few shallow domestic wells." In fact many cities and counties in potential selling regions have serious groundwater contamination problems with nitrate, selenium, arsenic, sulfate, other naturally occurring constituents, and pesticides. Water quality is a critical issue for both agricultural and domestic water supplies.

7. Potential impacts on wetlands and riparian areas are not adequately addressed in the DEIR.

Reductions in surface water flows and groundwater recharge could have impacts on fish, other species, river flows, riparian habitat, natural springs, and native vegetation. Many natural wetlands and springs are dependent on groundwater.

Benefits of any new water development should be shared among agricultural, urban and environmental sectors. This principal is not reflected in the conception of the proposed SWPP.

8. Potential impacts on the agricultural economy are not adequately addressed in the DEIR.

Declining groundwater levels would necessitate modifications of agricultural or domestic water systems that have shallow submergence. These increased

capital and operating costs could be quite significant for small agencies, county governments and agricultural businesses that are already struggling economically.

Much of northern Sacramento Valley's economy is based on agriculture. Therefore, summer groundwater yield is critical. Standards which are based on the return of groundwater levels within the water year provide no operable protection for the beneficial use of overlying agricultural land. Land prices and their earning ability are significantly influenced by the year-round availability of water.

Changes in the use of surface water can result in reduced harvest profits, with an adverse "multiplier effect" on the community as a whole. Both surface and groundwater transfers may influence county government economically. For example, transfer sale profits may not be taxable if corporations report them outside the area of origin. A downturn in the agricultural economy can translate quickly to increased social service costs. This phenomenon was documented in by Yolo County and shown to be directly related to the DWR Drought Water Bank. No reference is made to the claim filed by Yolo County documenting third party economic impacts from the Bank. This claim has yet to be paid.

There has been no study to substantiate the assumption that the revenues received by individuals that sell water result in the same local economic activity as a broad-based distribution of those same funds. The DEIR refers to the 1991 Rand study for justification of proposed SWPP. However, the Rand study makes it clear that their sample group was small and that the results only had application to a one year event. The study states that 67% of the farm reinvestment by water sellers was spent on wells. But the purchase of wells is a one time event. 26% of the money went to farm equipment purchase and repair, another event that wouldn't be repeated yearly. The net loss of agriculturally related economic activity may be higher in each successive year as land owners finish financing their deferred projects.

9. Potential cumulative impacts from various programs operating simultaneously are not adequately addressed in the DEIR.

Northern California ground and surface water supplies have been targeted by numerous sources: CVPIA; Central Valley Habitat Joint Venture Implementation Plan; CALFED and the proposed SWPP. It is not clear how the proposed SWPP will coordinate with the CALFED process, the SWRCB water rights process, or the Bureau of Reclamation's numerous programs under the CVPIA. Each separate program seems to be proceeding forward on a separate track. The proposed SWPP should be administered in coordination with CALFED.

The DEIR should assess the potential impacts of the total combined multi-year conjunctive use, groundwater banking and groundwater substitution projects being planned. An assessment of the potential for subsidence, groundwater quality degradation and permanent water level declines must be developed. Impacts upon the local economy, riparian habitat, the reliability of drinking water supplies, and the development potential of local properties should be developed. Instead, the DEIR states that "no significant cumulative impacts are expected."

Perhaps the most striking omission from the cumulative analysis is the effect of a drought and the activation of additional Drought Water Banks. How will the Drought Water Bank fulfill its mandate in a drought if it is only able to claim 10% of the capacity of the proposed SWPP? The unspoken expectation is that even more than 400,000 acre-feet of water will be expected to leave its area of origin during droughts. The DEIR never considers seriously the impacts of operating the proposed SWPP in a dry year along with additional water banks. The impacts of multiple water banks and water acquisition programs during dry years could be staggering in areas from which water is being transferred. This scenario is never examined.

10. DWR must administer the proposed SWPP in coordination with local entities and with full regard for local ordinances.

DWR should assure local entities that the proposed SWPP will adhere to local city and county groundwater ordinances and groundwater management plans. Unless DWR complies with local entities, polarization will result.

11. Potential impacts upon local development and statewide population are not adequately addressed in the DEIR.

There are several areas in the northern Sacramento Valley that are deficient in water supply. The northern Sacramento Valley cannot supply all of California's water needs. Water currently thought to be available will be needed as the Valley and Northern California continue to develop.

Several counties have projected their water needs into the future and have planning processes in place for meeting those needs. If not fully coordinated with local entities, the proposed SWPP could disrupt this planning process and even penalize those counties for their planning and conservation efforts which result in healthy water systems.

A decline in reliable local water supplies could hamper the development of new property in some counties. The DEIR states that the proposed SWPP will not result in any alteration of the location, distribution, density or growth rate of the human population of an area. This conclusion is not supported with text included in the DEIR.

The proposed SWPP is highly growth inducing when viewed from a statewide perspective. Removing water from currently healthy watersheds and basins to supply urban areas of the state will alter the economic and environmental viability in the areas of origin and will not encourage the receiving areas to practice sustainable management of the resources found in their own regions, nor will it prepare them for periods of drought. The program will give water-short areas the illusion of water security. Before a transfer is approved, the potential buyer must be required to document, using measurable and objective standards, the implementation of aggressive demand-side management programs.

12. Confusion regarding the duration and magnitude of the program should be cleared up and impact analysis should be done for the program in full operation.

The DEIR proposes a six year program to transfer ground and surface water, but analyzes impacts based on the unsubstantiated assertion that the program will not occur each year, nor transfer the proposed magnitude of water. No supporting documentation for this claim is offered. According to DWR's California Water Plan Update (October 1994), the State Water Project has the estimated capacity to deliver an average of 2.4 million acre-feet per year of water, while entitlements are now over 4.15 million acre-feet. Actual demand is projected to reach about 4.1 million acre-feet by the year 2010 . Further, the Update states that by the year 2000 – in the middle of the period in which the proposed SWPP is planned to operate – SWP delivery capacity will average about 2.6 million acre-feet, while demand is expected to be 3.7 million acre-feet. This shows that the SWP is facing a 1.1 million acre-foot shortfall. Yet the DEIR does not analyze these projections, even though they could mean that there will be requests for the full amount of water that the proposed SWPP could make available in all six years of the program.

The potential duration and magnitude of the program are also a concern because of repeated comparisons with a smaller program, the Drought Water Bank. The Drought Water Bank only transferred 400,000 acre-feet of surface and groundwater in one year – 1991. In the two other years of the Bank much less water was transferred. Yet the DEIR analyzes potential impacts based on a comparison of one year of the Drought Water Bank with six years of the proposed SWPP. This is clearly inappropriate.

Finally, it is not clear what additional water supplies will become available to the State Water Contractors that assure the public that the program will end after six years. If urban users come to depend on the transferred water, how can the water be "shut off"? The proposed SWPP has the potential for becoming a permanent water transfer.

13. Analysis of the No Action Alternative is flawed.

Analysis of the No Action Alternative and discussion of several potential impacts is based on statements about damage that would occur if water needs were not met during a drought. This is misleading, since the proposed SWPP is not proposed to address drought conditions.

In several cases, the need for the proposed SWPP is justified by descriptions of the damage that has been caused in the past in California during droughts. However, the explicitly stated reason for the proposed SWPP is not to meet drought needs but to meet water needs "in years when the SWP is unable to meet maximum annual entitlements for SWP contractors." The analysis of the No Action Alternative could have been presented for a Drought Water Bank, but it is not relevant to the proposed SWPP. The No Action Alternative study should be redone to analyze potential impacts without proposed SWPP.

14. Procedural considerations.

In order to ensure that the existing substantive deficiencies in the DEIR have been adequately addressed before DWR takes action on the proposed project, the existing environmental document must be redrafted and recirculated for further public comment.

The revised DEIR should address DWR's obligations with respect to use of the proposed environmental document for later related activities, consistent with CEQA Guidelines section 15168, subdivision (c). As noted in the CEQA guidelines, subsequent activities in the proposed Program will need to be examined in light of the ultimately adopted Program EIR to determine the requirement for and form of additional environmental documentation.

A revised EIR is both legally required and especially important considering that significant modifications in the proposed program have been announced since the DEIR was published.

Thank you for your attention to our concerns. We look forward to hearing from you.

Sincerely,

THE FOLLOWING SIGNATURES ARE ON FILE:

1318(14)

Attached is a summary of the fourteen most common concerns regarding the draft EIR.

For local comment, please contact one of the following individu

Butte County	
Vickie Newlin	**Butte County Water Division**
Linda Cole	**Valley Water Protection Assn.**
Colusa County	
Marion Mathis or Sue Sutton	**Family Water Alliance**
William Waite	**Supervisor**
Shasta County	
Richard Dickerson	**Supervisor**
James Underwood	**Shasta County Counsel**
Siskiyou County	
Wayne Virag	**Supervisor**
Solano County	
Mike Merkley	**Solano County Rancher**
Sutter County	
Dick Akin	**Supervisor**
Tehama County	
Bill Borror	**Supervisor**
Roger Sherrill	**Rio Alto Water District**
Dan Keppen	**Tehama County Public Works**
Charles Willard	**Tehama County Supervisor**
Yolo County	
Lynnel Pollock	**Supervisor**
Judith Redmond	**Comm. Alliance w/ Family Farmers**